

Dear FCC,

*Regarding the Notice of Rulemaking in ET Docket RM-10786, Petition to drop morse code testing requirements, I am hereby against any more relaxing of the morse code testing requirement to operate on 30Mhz and below. The amateur hf bands are still used extensively by many CW operators in the low 50Khz of each band. Most of this operation is in the low 25Khz of each band especially for DX operation where one may not know the verbal language of the DX station being worked, thus CW is the only way to work the distant station reliably.

*These requirements were already amended on 12/30/1999 where the FCC simplified the licensing system outlined in Part 97 of the rules effectively reducing the number of license classes from 6 to 3, and at the same time eliminated the 13wpm and the 20wpm morse code testing requirements leaving only the 5wpm (entry level Novice) requirement for the remaining higher class licenses.

*I feel that these bands are still used by proficient operators and the introduction of un-skilled operators into these frequencies would damage the capability of the former mentioned operators to reliably communicate with foreign countries. As a licensed amateur radio operator who uses these bands daily, I feel that the existing 5wpm (Extra Lite) operators are minding their own business and staying above .025 on the bands. However if you remove the existing testing requirements, it will only introduce havoc on the lower 25Khz of each band effectively killing any reliable DX operation.

*Morse code is still used on a daily basis, and anyone who says differently is ill educated in this art. Just turn on any hf receiver at any time of day on the 5 main amateur bands - (80,40,20,15,10meters), these of course not even including the WARC bands which are also very much CW (30Meters is ONLY CW) and listen around the bottom 50Khz of any band and you WILL hear many CW stations communicating. These stations are being operated by not only the "old timers", but there are many young operators also. So morse code is not going away by any means as a reliable mode of communication on the amateur bands.

*Morse code is still used in many commercial radio bands as identifiers as the FAA, Police, Fire, Amateur, Military etc.. Communication systems use morse code to identify their systems on the air, such as aviation VOR beacon stations or even a local police repeater auto identifying itself.

*Morse code is still the backup mode (when everything else fails) to communicate during an emergency. Just think how bad it would be if a boat that was lost at sea and the microphone got wet or damaged but no one knew morse code anymore, that would truly be a shame as the "mayday" or the "sos" could still be sent by the ships ptt switch or even a couple of wires touching together. Aircraft can send morse code in a distress situation by turning the lights on and off, only as a last resort but if there were no more proficient morse code operators, it would be for not.

*I hereby state as a licensed amateur radio operator (callsign W2CO) and a commercially licensed (GROL PG-GB-029372) with ship radar endorsement, am hereby against any further rule changes to Part 97 regarding morse code testing requirements to obtain a higher class amateur license. The existing 5wpm requirement for the higher class licenses is already easy enough to get, and if any changes are to be made to said rules, they should stay out of the lower 25Khz of each band until they are proficiently skilled.

Sincerely,

Thomas M. Walsh
A.R.S. W2CO
GROL PG-GB-029372
Ship Radar